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January 26, 2021

By separate order this case is referred to Magistrate Judge Wang for general pretrial purposes, and the parties shall thus raise these and other pretrial issues with Judge Wang.

VIA ECF AND E-MAIL
(Abrams NYSDChambers@nysd.uscourts.gov)

SO ORDERED.

Hon. Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Hon. Ronnie Abrams
January 27, 2021

Re: Solid State Elevator Corporation v. ABF Freight System, Inc.
Civil Action No. 20-cv-2419 (RA) (OTW)

Dear Judge Abrams:

We are counsel for defendant ABF Freight System, Inc. ("ABF") and write further to our December 18, 2020 letter (Doc. 23) to the Court concerning ABF's outstanding discovery requests to plaintiff.

After further written correspondence and a telephone conference between counsel on January 15, 2021, we have still not received plaintiff's verified amended interrogatory responses relating to its denials of ABF's Requests for Admission that are relevant to defendant's anticipated motion for a summary judgment dismissal of the action.

By email on January 25, 2021, we advised plaintiff's counsel of our intention to apply to the Court for relief if we did not receive an agreed date for their service of plaintiff's supplemental interrogatory responses and we have received no date.

Under the circumstances, we respectfully request that the Court direct plaintiff to serve its verified supplemental interrogatory responses no later than February 5, 2021 or, alternatively, refer the matter to a U.S. Magistrate Judge for a conference.

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We appreciate your attention and consideration.

Respectfully submitted,

A handwritten signature in blue ink that reads 'George W. Wright'.

George W. Wright

GWW:ds

cc. Michael M. Rabinowitz, Esq. (mwitz@optonline.net)
Lisa A. Gutman, Esq. (lgutman@randglaw.net)